UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 5, 2001

Ms. Remonia Davis, Environmental Manager
BGF Industries, Inc.
401 Amherst Ave.
Altavista, VA 24517

RE: Site Characterization Report for BGF Industries, Inc.'s Altavista, Virginia facility

Dear Ms. Davis:

This letter is in response to BGF Industries, Inc.'s (BGF) Site Characterization Report, submitted by Alston and Bird LLP on April 3, 2001 on behalf of BGF, to the U.S. Environmental Protection Agency, Region III ("EPA"), describing assessment activities conducted to define the extent of polychlorinated biphenyl ("PCB") contamination at BGF's facility, and portions of the unnamed tributary of the Staunton River that begins at the sluice gate area on BGF's property, in Altavista, Virginia. ATC Associates Inc. ("ATC") conducted the assessment on behalf of BGF.

EPA has reviewed BGF's Site Characterization Report to ensure that the information is consistent with the requirements of the *Site Characterization* regulations at 40 C.F.R. § 761.61(a)(2), in anticipation of the submission of a self-implementing site cleanup workplan, as described at 40 C.F.R. § 761.61(a). EPA emphasizes that these regulations include several conditions and limitations that apply to persons performing "self-implementing on-site cleanup and disposal of PCB remediation waste." Among other things, the regulations state that "[complete compliance with 40 C.F.R. § 761.61(a) does not create a presumption against enforcement action for penalties for any unauthorized PCB disposal." 40 C.F.R. § 761.50(b)(3)(ii)(B). Further, "[any person storing or disposing of PCBs is also responsible for determining and complying with all other applicable Federal, State, and local laws and regulations." 40 C.F.R. § 761.50(a)(6).

EPA's review has noted that deficiencies exist in the Site Characterization Report in regards to data needed for conducting a self-implementing site cleanup of the PCB contamination at the facility. Generally speaking, most of the comments made by EPA and the Virginia Department of Environmental Quality (VADEQ) deal with sample methodology clarification, incomplete or incorrect data depicted on figures and tables as they relate to each other, and detection limit issues with some of the groundwater data. Most of these issues can be

explained or clarified by written explanation. Please submit explanations and clarification for those questions and comments to both EPA and VADEQ.

EPA is in agreement with VADEQ, as noted in their July 5, 2001letter to EPA (BGF and ATC Associates were copied on this letter), that the extent of soil contamination at the Sluice Gate Area needs to be more fully defined before a remedial strategy can be developed to address the contamination located there. Specifically, additional samples need to be collected to define the vertical extent of PCB concentrations along the covered portion of the creek that runs from the shed to the sluice gate, as shown in Figure 23 of the Site Characterization Report. Samples B-21, B-22 and B-23, collected parallel with the covered portion of the creek from the shed to the sluice gate area, all have PCB concentrations in excess of 1,500 mg/kg. These were the deepest samples collected along the covered portion of the creek. As such, additional samples should be collected at greater depths at or near these locations to determine the vertical extent of PCB concentrations that are above regulated levels. Additionally, due to concentrations of PCBs found in shallow surface samples (0.25 - 2 feet below ground surface) at the southern edge of the sluice gate area (concentrations of 13.9, 0.95 and 3.33 mg/kg at sample locations B-50, B-51 and B-52, respectively), additional sampling south of the aforementioned sample locations is warranted, until samples are found to contain non-detectable concentrations of PCBs, or at least less than 1 mg/kg, which is the cleanup level for PCB remediation waste in high occupancy areas.

With these requirements fulfilled, a better understanding of the extent of PCB contamination at BGF's facility will be realized, which will allow for development of a comprehensive cleanup plan for the site.

The provisions located at 40 C.F.R. 761.61(a), do not apply to the characterization or cleanup of surface or groundwater, sediments in marine and freshwater ecosystems, and sewers or sewage treatment systems, all of which have been impacted from PCB sources located on BGF's property. The deepest samples collected from the creek bed, along its entire length from the sluice gate to its confluence with the Staunton River, were collected from two to five feet below ground surface. PCB concentrations of samples collected at these depths along the length of the creek range from below detection limit (BDL) to 975 mg/kg PCBs. Samples collected from greater depths in the immediate vicinity of the sluice gate clearly indicate that PCB concentrations decrease with depth below ground surface, and that those samples collected at depths of twelve feet and greater have either undetectable or unregulated concentrations of PCBs. However, the sampling conducted in the creek bed from the sluice gate to the Staunton River was not conducted at depths great enough to fully delineate the vertical extent of contamination. Additional sampling at depths greater than those already sampled is warranted in the creek bed. Additionally, significant PCB concentrations (greater than 50 mg/kg at sample S-1-D) were observed in samples collected at the farthest downstream points of the creek, just before it enters the Staunton River. While it is not yet necessary to conduct a complete characterization of the extent of contamination that has migrated offsite prior to initiation of a self-implementing site cleanup workplan for the contamination located in on-site soils (the BGF

facility), BGF must recognize that offsite media (soil, sediment, water) has been impacted by PCBs which have migrated from PCB sources located on the BGF facility property, and that additional characterization and potential remediation of these offsite media may be necessary to alleviate the threat of PCBs to human health and the environment.

Please direct any questions in this matter to:

Mr. Scott Rice
U.S. Environmental Protection Agency
Region III
Waste and Chemicals Management Division
1060 Chapline Street
Wheeling, WV 26003

Any questions concerning the Site Characterization Report and/or self-implementing site cleanup plan should be directed to Mr. Rice at (304) 231-0501.

Sincerely,

James J. Burke, Director
Waste and Chemicals Management Division

cc: Dr. Khizar Wasti, VADOH
Ms. Erica Dameron, VADEQ
Dr. Michael Scanlon, VADEQ
Mr. Eric Shertzer, ATC